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States Government

Department of Energy

Rocky Flats Office

DUE
DATE 7-18-91

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ACTION Kersh

DIST LTR ENC

BENJAMIN A	
BRETZKE, J C	
BURLINGAME, A H	
COPP, R D	
CROUCHER, D W	
DAVIS, J G	
EVERED, J E	X
FERRERA, D W	
FERRIS, L R	
FRAIKOR, F J	
FRANCIS, G E	
GOODWIN, R	
HANNI, B J	
HEALY, T J	
IDEKER, E H	
JENS, J P	
KERSH, J M	✓
KIRBY, W A	
KRIEG, D	
LEE, E M	
MAJESTIC, J R	
MARX, G E	
MATHEWS, T A	
McCLUSKY, J K	
MEURRENS, B E	
MORGAN, R V	X
PIZZUTO, V M	
POTTER, G L	X
SAFFELL, B F	
SANDLIN, N B	
SWANSON, E R	
WIEBE, J S	
WILKINSON, R B	
WILSON, J M	
YOUNG, E R	
ZANE, J O	

JUN 17 1991

WMED JW 4822

Minutes from Meeting with Colorado Department of Health, June 12, 1991

Tom Lukow, Director
Waste Management & Environment Division

We met with CDH personnel from permitting, solid waste and enforcement groups to discuss the plans for the current and new landfills. A list of attendees and charts that were presented are attached.

The issues that surfaced are:

1. Schedule for closure of old landfill
2. Requirement for a closure plan to be submitted under Colorado Code of Regulations (CCR) (similar to RCRA Subtitle D).
3. Asbestos disposal
4. Mounding
5. Operations procedures to preclude placement of hazardous waste into sanitary landfill

Each of these issues is discussed below.

1. Schedule for closure of old landfill CDH has previously been told that the old landfill will be closed in 1991/92. Some people even think they were once told it would be closed by 1990. The fact that CERCLA field investigations and sampling will be occurring while the old landfill is still operating creates concerns for CDH. This is especially true since they have not seen any operational procedures that indicate we are effectively keeping hazardous wastes from still going into landfill. EG&G explained that new procedures would be developed and in-place by Aug 91 at the landfill and that plantwide procedures would be in-place in 1992. This was seen as a positive step, but CDH was not convinced that this type of action should not have already occurred. It was indicated by CDH that a formal letter would be sent to us setting a date by which the old landfill had to be out of operation. This date is expected to be Mar 94. CDH also indicated that our actions on the old landfill and new landfill need to be on a "fast-track" schedule. Key to this issue will be insuring the new landfill program is provided with line item funding in FY92.

2. Requirement for a closure plan to be submitted under CCR (RCRA) Subtitle D This issue was brought up by the solid waste group at CDH. Evidently Colorado Code of Regulations for Solid Waste indicates that a closure plan must be submitted and approved 60 days before the landfill stops operating. This was not known or planned in the CERCLA closure actions or indicated in the IAG. EG&G must determine the appropriate method to accommodate this issue and a proposal will be made to CDH.

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3. Asbestos disposal. To work towards resolution of this issue it was requested by CDH that the total inventory of friable asbestos we propose for disposal be ascertained. Then it could potentially be proposed that the friable asbestos be disposed of in the landfill on a "one-time-basis". This action would have to involve the Jefferson County Commissioners as well as CDH. What was being recommended by CDH was a one time, volume restricted disposal in a rigid container within the landfill area. It appeared highly unlikely, from CDH's point of view, that friable asbestos could be disposed of on a regular basis in the landfill. The disposal procedures for non-friable asbestos were questioned somewhat but no real issues surfaced.

4. Mounding. This issue involves the requirement to begin mounding above the natural grade in the landfill area. CDH generally accepted our rationale for this action but wanted to have another meeting between the responsible technical people to understand just what was being proposed and how we would maintain adequate controls. This is an EG&G action.

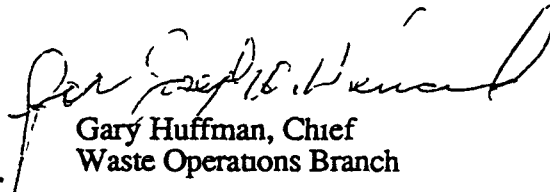
5. Operational Procedures to preclude placement of hazardous waste in the sanitary landfill. This was a key issue with CDH personnel. These procedures are currently under development by EG&G and should be locally in place at the landfill by August 1991. Plant wide procedures are being developed for implementation in 1992. CDH indicated that we should be in compliance with Colorado Sanitary Waste regulations NOW! The fact that sanitized medical wastes were being landfilled was of particular interest. EG&G has indicated that there are not any FORMAL procedures in place for the sterilization and disposal of medical waste but that the clinic is following accepted practice for infectious waste forms. Procedures are also currently being developed for this area of waste. These procedures were requested to be submitted to CDH upon completion. EG&G will be directed to provide these to RFO for transmittal to CDH.

Other items of interest:

CDH indicated that the current validation process for analytical data takes much too long (average 6 months). This is a continuing concern on CDH's part.

CDH stressed the need to keep landfill area dry from precipitation and minimize the open/working face of the landfill.

CDH also indicated that we should be submitting groundwater analysis from the landfill area to the Solid Waste Unit. This report includes approximately 20 constituents required under the Colorado Code of Regulations for solid waste landfills


Gary Huffman, Chief
Waste Operations Branch

Attachment

cc:

F Gerdeman, DOE/RFO
K. Tichnor, EG&G/RFP
R.T. Ogg, EG&G/RFP
M. Arndt, EG&G/RFP
J.T. Crone, EG&G/RFP
J. Ciucci, EG&G/RFP
J. Barthel, EG&G/RFP
D.R. Lobdell, EG&G/RFP
J.D. Wienand, DOE/RFO
B. Birk, DOE/RFO
F. Lockhart, DOE/RFO